



**U.S. Department of Justice**

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Northern District of California*

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February 15, 2011

BY U.S. MAIL AND EMAIL

Patrick Berdge  
California Public Utilities Commission  
Legal Department  
505 Van Ness Avenue, Rm 4300-G  
San Francisco, CA 94102

Re: San Bruno Explosion


Dear Mr. Berdge:

As we have discussed, attached please find a document request pursuant to the above-referenced matter. Documents to be produced shall include all documents in the possession, custody or control of your client, the California Public Utilities Commission ("CPUC") wherever located, including documents in the possession, custody or control of your client's directors, officers, employees, representatives or agents. Given the extent of the request, we would hope to work with the CPUC in determining the actual scope of relevant documents and the extent to which documents requested are in the possession of the CPUC. We would like to have the documents produced in three weeks, if possible. To the extent that our request corresponds to documents already produced to other agencies, we would hope to work with the CPUC so as to avoid the duplication of effort on the part of the CPUC.

Please contact me if you have any questions concerning the foregoing. You can reach me at (415) 436-7126.

Very truly yours,

MELINDA HAAG  
United States Attorney

  
STACEY P. GEIS  
Assistant United States Attorney

## **DOCUMENTS TO BE PRODUCED**

Unless otherwise specified, all requests are for documents from January 1, 2000, to present.

### **Gas Transmission Line 132**

1. Any and all documents referencing pressure levels for Line 132 on September 9, 2010, whether recorded electronically, mechanically, manually or otherwise.
2. Any and all documents pertaining to the design, manufacturing, construction, installation, initial inspection and initial testing of what is now called Line 132, including any and all documents pertaining to the design, manufacturing, construction, installation, initial inspection and initial testing of the pipe segments or components out of which Line 132 was constructed.
3. Any and all documents pertaining to real or potential seismic assessments or activity (including but not limited to the subjects of seismic durability and/or seismic upgrades) involving or affecting Line 132 and/or the area involving Line 132.
4. Any and all documents identifying persons who constructed and/or installed any segment of Line 132 in the San Bruno area.
5. Any and all documents indicating any over-pressurization concerns with Line 132 when it was connected with transmission Line 109.
6. Any and all documents pertaining to the placement of regulators between Line 132 and Line 109 after the San Bruno pipeline explosion.
7. Any and all documents pertaining to any PG&E inspection of Line 132.
8. Any and all documents referencing inquiries and/or complaints concerning potential gas leaks and/or gas odors in the vicinity of the location where Line 132 ruptured.
9. Any and all documents of communication, including all reports, memos, correspondence and e-mails, from PG&E to CPUC concerning the rupture of Line 132.
10. From 1990 to present, any and all documents pertaining to geological surveys, geologic maps, "Geologic Hazard Reports," and/or "Geologic Hazard Evaluations" relevant to Line 132 and/or other gas transmission lines in the San Bruno area, including any and all communication between PG&E representatives and the city of San Bruno pertaining to such surveys, maps, reports or evaluations.
11. From 1990 to present, any and all documents pertaining to environmental analyses or "Environmental Analysis Reports" relevant to Line 132 and/or other gas transmission lines in the San Bruno area, , including any and all communication between PG&E

representatives and the city of San Bruno pertaining to such analyses or reports.

12. From 1990 to present, any and all documents pertaining to PG&E plans or discussions pertaining to the possible replacement of Line 132 or other gas transmission lines in the San Bruno area, including any and all communication between PG&E and the city of San Bruno pertaining to such plans or discussions.

#### **Integrity Management and Inspections**

13. Any and all documents referencing PG&E's pipeline integrity management program, including any and all records describing particular assessment or inspection techniques employed by PG&E, including but not limited to direct assessment, in-line inspection or "smart pigging," and hydrostatic testing.
14. Any and all documents indicating when and where assessment or inspection techniques—including but not limited to direct assessment, in-line inspection or "smart pigging," and/or hydrostatic testing—have been used on PG&E transmission pipelines, including the results of these assessments or inspections, and any and all documents indicating where assessment or inspection techniques will be employed in the future.
15. Any and all documents pertaining to criteria employed by PG&E in determining which inspection or assessment technique to use on a particular segment of pipeline, including any and all documents indicating which pipeline segments have been deemed not suitable for in-line inspection.
16. Any and all documents pertaining to methodologies used by PG&E to assess or "pre-assess" the relative risk or integrity of different segments of pipeline, including risk factors considered, weight assigned to various risk factors, and assumptions made. This includes any and all documents pertaining to pre-assessments, assessments or inspections of Line 132 or any other transmission pipeline.
17. Any and all documents pertaining to internal or external audits or reviews by CPUC of PG&E integrity management programs and assessment or inspection techniques. This request includes documents PG&E provided to CPUC, such as responses, letters, or other submittals.
18. Any and all documents pertaining to the Integrated Gas Information System (IGIS) or any other PG&E leak management program, including any data from IGIS in native format.
19. Any and all documents pertaining to PG&E's leak re-survey program, including PG&E's quarterly status reports on the re-survey program.

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### **Pipeline Safety Generally**

20. Any and all documents pertaining to PG&E's noncompliance with federal or state statutes and regulations governing hazardous materials and pipeline safety, including the Rancho Cordova incident.
21. Any and all documents pertaining to safety-related conditions (as defined in 49 CFR § 191.23) on any gas transmission pipeline, including any reports submitted by or on behalf of PG&E in accordance with 49 CFR § 191.25.
22. Any and all documents pertaining to instances in which the maximum allowable operating pressure of a PG&E gas transmission line was exceeded, including any instance in which it was exceeded by less than 10%.
23. Any and all documents pertaining to notifications from PG&E to CPUC of incidents listed on PG&E's Quarterly Summary Incident Reports, and any and all records or information that PG&E provided to CPUC regarding such incidents.
24. Any and all inspection reports or audits of PG&E's Maintenance Yards located on Industrial Ave. in San Carlos and Milpitas.

### **Pipeline Installation, Replacement and Repair**

25. Any and all documents mapping the location of gas transmission pipeline in the San Bruno area by year or decade of installation, beginning with the earliest year or decade in which such pipeline was installed, and including any such pipeline for which the year or decade of installation is unknown and/or listed as unknown.
26. Any and all documents pertaining to welds on PG&E's gas transmission pipelines, including any and all documents pertaining to "long-seam threats," longitudinal welds, girth welds, and/or any defective, nonstandard or substandard welds identified on any transmission pipelines.
27. Any and all documents pertaining to PG&E purchases of 30-inch steel pipe in the years 1940-1960.
28. Any and all documents pertaining to transmission pipeline replacement or repairs that were reported by PG&E in its Gas Transmission & Gathering Systems Reports.
29. Any and all documents pertaining to the location of transmission pipeline segments that have been or will be removed from coverage under the Gas Pipeline Replacement Program (GPRP).
30. Any and all documents pertaining to replacement, repair or inspection of any transmission pipeline segments removed from coverage under GPRP.

### **PG&E Policies, Plans, Procedures**

31. Any and all documents describing recordkeeping protocols employed by PG&E pertaining to pipeline installation, pipeline safety and/or pipeline integrity management.
32. Any and all documents describing PG&E protocols, including emergency or contingency plans, relevant to pipeline rupture.
33. Any and all documents describing the organizational structure of any PG&E divisions, components, and/or employees or contractors involved in gas system operations, pipeline safety and or pipeline integrity management.
34. Any and all documents referencing PG&E's policies, procedures and/or practices concerning direct assessment of gas transmission lines.
35. Any and all documents describing PG&E protocols employed in populating geographical information systems (GIS) databases or software with information pertaining to Line 132 or other transmission pipelines, including any quality control or quality assurance protocols for such information.
36. Any and all documents referencing PG&E document or standard "RMP-06."
37. Any and all documents referencing PG&E's policies, procedures and/or practices for spiking gas pressure in gas transmission lines.

### **PG&E Reports**

38. Any and all semi-annual reports on PG&E's Integrity Management Program, including the February 28, 2011 Report, as soon as it is received.
39. Any and all Risk Management Program and Integrity Management Program Annual Reports, including for the year 2010 (when available), including all exhibits or appendices and all supporting documentation provided to CPUC related to these reports.
40. Any and all Quarterly Summary Incident Reports.
41. Any and all Leak Survey and Leak Repair reports, or any similar reports, for PG&E's gas transmission lines.

### **Milpitas Terminal**

42. Any and all documents pertaining to communication between PG&E's gas control room and any individuals working in or at Milpitas Terminal on September 9, 2010, including messages sent and received via PG&E's "gas logging system," emails, electronic pages or

"e-Pages," text messages, and telephone calls. This includes any recorded copies of the contents of such communication.

43. Any and all documents pertaining to safety protocols, standard operating procedures, work plans, work clearance requests and/or approvals, or "tailboards" relevant to any electrical or engineering work conducted in or at Milpitas Terminal on September 9, 2010.

#### **Other Information**

44. The names and contact information of all people that have been identified to CPUC (including but not limited to any PG&E employees, PG&E contractors, City of San Bruno employees, and/or City of San Bruno contractors) who worked on any phase of the Rollingwood Sewer Basin Improvement Project, including but not limited to people who conducted pipe-bursting work, or were present when pipe-bursting work was conducted.
45. Any and all documents that constitute or refer to contracts between PG&E and Mears Group, Inc., for performance of work and/or activities with respect to PG&E gas transmission pipelines including any and all documents that set forth or refer to the results, data and/or analysis from such Mears Group work and/or activities.